



Phillips 66  
Los Angeles Refinery – Wilmington or MT Plant  
1660 West Anaheim Street  
Wilmington, CA 90744  
P.O. Box 758  
Wilmington, CA 90748-0758  
Telephone (310) 952-6000  
[www.phillips66.com](http://www.phillips66.com)

**CERTIFIED MAIL RETURN RECEIPT REQUESTED**

August 26, 2016

Richard M. Francis  
U.S. EPA Region 9  
75 Hawthorne St. (ENG-2-2)  
San Francisco, CA 94105-3901

**PHILLIPS 66 COMPANY LOS ANGELES REFINERY**  
**RESPONSE TO: Email - Seeking Additional Documentation re 10/15/2016 EPA**  
**Information Request**  
**INSPECTION DATE: August 25-28, 2015**  
**WILMINGTON PLANT; EPA ID NO. CAD008237679**

Dear Mr. Francis:

Enclosed is Phillips 66 Company's response to your e-mail request for additional documentation, dated August 1, 2016, but not received by its intended recipient (Cheryl Cobb) until August 15, 2016.

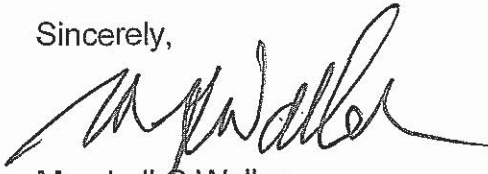
Your e-mail request for additional documentation reads as follows:

- My team and I are getting ready to finalize our report for the RCRA inspection conducted in August, 2015. We apologize for the delay, but there have been some external circumstances that has delayed the process. I am writing now in regards to the response to my 10/15/2015 information request letter that was dated 11/12/2015. Please note that this request for additional information falls under the same authority granted EPA under Section 3007(a) of the resource Conservation and Recovery Act (RCRA). In the October 2015 Request for Information, Question 4, EPA asked Phillips 66 to provide documentation showing removal of material from Tank 0 at the Wilmington facility. In your November 2015 response, Phillips 66 provided a single "Vacuum Truck Loading/Offloading Form" dated 08/08/2012 and noted with the term "Lab Oil" on the document. EPA requests that Phillips 66 provide all such forms used for the unloading of Tank 0 for the past three years.

Phillips 66 has attached copies of all documents in its possession, custody, or control responsive to your request as Exhibit 1 to this letter. The reason that the number of responsive documents is small relates to the nature and limited movement of the material being transported. As we have explained previously, movement of the oil-bearing secondary material from Tank 0 occurs solely within the facility boundary. Therefore, refinery personnel do not retain copies of the Vacuum Truck Loading/Offloading Forms in the normal course of business as we would for manifests and/or bills of lading used to transport waste offsite. We do, however, record movements of the oil-bearing secondary material moved from Tank 0 via spreadsheet and, as a courtesy, are providing a hard copy of that data.

If you have any questions, please contact Cheryl Cobb at (310) 952-6210.

Sincerely,

A handwritten signature in black ink, appearing to read "M. G. Waller", written in a cursive style.

Marshall G Waller  
Environmental Director

Enclosures

Exhibit 1  
 PHILLIPS 66 COMPANY  
 LARW - Tank O Recovered Oil 2013-2016

	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE
RECOVERED OIL 2016	6/14/2016	2/3/2016	2/23/2016	3/10/2016	3/23/2016	4/12/2016	4/13/2016	5/4/2016	5/26/16	5/27/2016	6/21/2016	7/16/2016	8/1/2016		
UNIT OF AREA	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL
LAB	500	825	650		770	368	0	714		400	625	750			

	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE
RECOVERY OIL 2015	1/26/2015	2/23/2015	3/20/2015	4/3/2015	4/17/2015	5/7/2015	6/22/2015	7/31/2015	8/11/2015	9/11/2015	8/24/2015	11/6/2015	11/6/2015	12/3/2015	
UNIT OF AREA	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL
LAB	700	750	600		600			600			600		165	30	

	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE
RECOVERY OIL 2014	1/21/2014	2/17/2014	3/4/2014	4/14/2014	5/7/2014	5/29/2014	6/3/2014	7/3/2014	8/3/2014	8/12/2014	9/25/2014	10/6/2014	11/20/2014	12/11/2014	12/30/2014
UNIT OF AREA	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL
LAB	700	600		600			600	600	550		0	550	600	700	

	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE
RECOVERY OIL 2013		2/1/2013	3/5/2013	4/8/2013	5/29/2013		7/24/2013	8/22/2013		10/10/2013	11/1/2013	
UNIT OF AREA	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL	GAL
LAB		400	400	400	400	400	400	400	400	400	400	